

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – BAY CITY**

IN RE:

Ilakeisa Luckado

Debtor

_____ /

Chapter 7 Bankruptcy
Bankruptcy No. 21-20908
HON. Daniel Opperman

Creditor (s) Elga Credit Union
Address 8503 Davison Road
Davison, MI 48423

**MOTION BY DEBTOR ILAKEISA
LUCKADO FOR REDEMPTION
UNDER 11 U.S.C. §722**

Now comes the Debtor by and through counsel, and moves the court pursuant to 11 U.S.C. and Bankruptcy Rule 6008 for a Redemption Order on the following grounds:

1. The item to be redeemed is tangible personal property intended primarily for personal, family or household use is more particularly described as follows:

Year 2007 Make Saturn Model Aura

VIN # 1G8ZS57N37F235882

2. The interest of the Debtor (s) in such property is exempt or has been abandoned by the estate and the debt (which is secured by said property to the extent of the allowed secured claim of the Creditor) is a dischargeable consumer debt.
3. The allowed secured claim of said Creditor for purposes of redemption, the “redemption value”, should be determined to be not more than \$502.00 as evidenced by the attached written appraisal, KELLY BLUE BOOK. The vehicle is currently in operable and in need of repairs.
4. Arrangements have been made by the Debtor (s) to pay to the said Creditor up to the aforesaid amount in a lump sum should this motion be granted.

WHEREFORE, the Debtor (s) request (s) the Court to order the said Creditor to accept from the Debtor (s) the lump sum payment of the redemption value and release their lien of record. In the event the said Creditor objects to this motion, the Debtor (s) requests the Court to determine the value of the property as of the time of the hearing on such objection.

DATED: 9/19/2021

/s/Roxane M. Kaye (P64118)
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